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The Sherwin-Williams Company
Environmental, Health & Regulatory Services
101 Prospect Avenue, N.W.
Cleveland, Ohio 44115-1075
Facsimile: (216) 566-2730

May 2, 2002

Bonnie L. Green, On-Scene Coordinator
United States Environmental Protection Agency
Region II – Removal Action Branch
2890 Woodbridge Avenue, Bldg. 209, MS-211
Edison, New Jersey 08837-3679

Re: Response to CERCLA Notice Regarding Seep Area Release
Corner of Foster and United States Avenue
Gibbsboro, New Jersey

Dear Ms. Green,

The Sherwin-Williams Company is in receipt of the United States Environmental Protection Agency Notice to Responsible Party under the Comprehensive Environmental Response, Compensation and Liability Act of 1980 and the Superfund Amendments and Reauthorization Act of 1986 prepared by you and issued to the The Sherwin-Williams Company on April 29, 2002. In response to that notice, we have prepared the attached summary of events and activities conducted to date, and proposed activities which we will conduct to address the release to Hilliards Creek and the seep area in the adjacent parking lot.

If you should have any questions or comments regarding the attached summary, please do not hesitate to contact me at (216) 566-1794 or via e-mail at mlcapichioni@sherwin.com

Sincerely,

Mary Lou Capichioni
Director, Remediation Services

Encl.

cc: John Doyon, NJDEP
Emmett Keveney, USEPA-Remedial
John Gerulis, S-W
Allen Danzig, S-W
Dan Kopcow, Weston

Summary of Events

April 9, 2002 - Personnel from Roy F. Weston, Inc. (Weston), on behalf of The Sherwin-Williams Company (Sherwin-Williams) visited the site to oversee a disposal contractor pumping out the Free Product Recovery system accumulation tank. While walking the site to verify that all was in order, the Weston staff observed free product in the storm water drain nearest to the creek and in the rip-rap. Since the disposal contractor was at the site, Weston directed the disposal contractor to evacuate the storm water drain and vacuum up the seeping product. Approximately 1,800 gallons of water and product was pumped. Absorbent booms and pads were placed to collect any further releases. Pumping continued overnight with a total of approximately 5,460 gallons collected from the storm water inlet nearest the creek (inlet "C") and the catch basin in the parking lot (catch basin "A").

April 10, 2002 - Additional manpower and equipment was mobilized to the site to continue evacuating the storm water drain. An attempt was also made to clean out the drain lines that connect the upstream (Catch Basin A) storm drain and junction box (Manhole B) to the storm water inlet (Inlet C). Approximately 2,100 gallons of cleaning water were transported off site. The site was secured and additional absorbent booms and pads were placed in and around the storm water drain, the rip-rap and the creek.

April 11, 12, 13, 2002 - Weston personnel continued to monitor the site on a daily basis. No water or product was pumped during this time period.

April 15, 2002 - Weston personnel visited the site along with the disposal contractor. A total of 800 gallons of water and product was evacuated on this date.

April 17, 2002 - Weston personnel visited the site along with the disposal contractor. A total of 3,000 gallons of water and product was evacuated on this date.

April 18, 2002 - A meeting was held at the seep site. In attendance were the following: Bonnie Green (EPA - Removal), Emmett Keveney (EPA - Remedial), John Doyon (NJDEP), Vince Barber (Camden County Health Dept.), Mary Lou Capichioni (Sherwin-Williams), Dan Kopcow (Weston), Ted Toskos (Weston), and Art Fisher (Weston). At this time it was stated that EPA-Removal would be the lead agency overseeing the conditions at this site with regards to the ongoing seep area remediation and the new release situation regarding Hilliards Creek.

The NJDEP HotLine and the NRC HotLine were notified on April 11 and 17, 2002, respectively. The following incident numbers were assigned:

- NJDEP: 0204114715-26 (Operator #26)
- NRC: 599887 (Operator "Jones")

Weston has continued to operate the existing free-product recovery system and monitor the site following the onset of this free product seepage event. Weston has continued to evacuate product from the storm drains and inlets as it accumulates and to replace any absorbent booms or pads as they become saturated. The following activities are proposed for the immediate and short-term response to this incident, as well as the anticipated time frame for implementation.

Response Activities

To address the short-term concerns from the release, the following activities have been or will soon be, undertaken:

Task 1 – Free Product Fingerprint Analysis

In order to identify the free product and to compare it to prior releases, free product samples will be collected and submitted for fingerprint and volatile organic compound analysis.

Schedule – Free product samples were collected on April 10, 2002, and submitted to the laboratory on April 11, 2002, for fingerprint and VOC analysis. The standard turnaround time for these samples is 20 business days. It is anticipated that the laboratory deliverables will be received the week of May 13, 2002.

Task 2 – Product Recovery

In order to capture the free product that is collecting in Inlet C, it is proposed to install an active oil skimmer in the existing inlet. The newly installed skimmer is proposed to run off the existing air compressor and will discharge to the existing product recovery tank. The catch basin will have to be retrofitted to accept the skimmer pump. Air supply and product discharge lines will be run overland from the existing system to the catch basin. The air and product lines will be run inside a 4- inch diameter PVC pipe to serve as protection and secondary containment.

Schedule – Installation completed and system operational on April 29, 2002.

Task 3 – Manhole B Excavation

In order to evaluate the integrity of Manhole B, it is proposed to remove the asphalt cover to gain access to this manhole to inspect the manhole and piping.

Schedule – Excavation activities completed on April 29, 2002.

Task 4A – TV Survey and Pipe Jetting and Cleaning

In order to evaluate the integrity of Catch Basin A, Manhole B, Inlet C and all interconnecting pipes, it is proposed to perform a TV survey and evaluate whether to repair or replace lines or the entire drainage system. Depending upon the results of the initial TV survey, it may be necessary to clean out the system with a pipe jetting truck, if a blockage is discovered. Repeat inspection to verify success of jetting activities.

Schedule – Tentatively scheduled for Friday, May 3, 2002, or the following week (week of May 6th) depending upon contractor availability.

Proposed Activities

These above-mentioned activities will address the immediate and short-term environmental concerns. Once these tasks are completed, Sherwin-Williams will evaluate the results of these activities and propose a plan to address the free product still in the formation. As part of this evaluation, Sherwin-Williams will review the previous investigations and remedial activities performed. In general, the following activities are proposed as part of the long-term response:

Task 5 – Repair/replace system design

Evaluate results of TV survey and jetting activities. If the inspection reveals structural failure, it may be necessary to repair or rebuild all or part of the system. Design pipe diameters, inverts and repair/replacement system.

Task 6 – Repair/replace drainage system

Repair and/or replace entire drainage system including catch basins, inlets, manholes and all interconnecting piping, as required and in accordance with the design activities in Task 5.

Task 7 – Soil/free product delineation

Perform geoprobe, hydropunch or MIP survey to determine extent of free product plume. Collect soil and/or groundwater samples if real-time plume delineation is not possible.

Task 8 – Remedial design

Based upon the results of the delineation activities a remedial design to address the free product extent will be evaluated. The remedial design recommendations may potentially include expansion of the free product recovery system, installation of a cut-off trench or French drain interceptor trench with associated product recovery, soil excavation or other options as determined.

In summary, The Sherwin-Williams Company has taken and plans to take all measures necessary to expeditiously address this issue in response to the EPA Notice. However, the work conducted and to be conducted, should not be construed as an admission of fact or liability, or a waiver of Sherwin-Williams' rights.